Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
1		10/30/18	Toni Martinez	Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
2		10/30/18	Jean Nechvatal	Maya Bordeaux; Grant Whitmore; Timothy Knight; Marisa Kollias; Ann Barnes	Toni Martinez; Mindy Lees*		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
3		10/30/18	Jean Nechvatal	Maya Bordeaux; Timothy Knight; Marisa Kollias; Ann Barnes	Toni Martinez; Mindy Lees*; Grant Whitmore		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
4		10/30/18	Jean Nechvatal	Maya Bordeaux; Timothy Knight; Marisa Kollias; Ann Barnes	Toni Martinez; Mindy Lees*; Grant Whitmore		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
5		10/30/18	Marisa Kollias	Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes	Toni Martinez; Mindy Lees*; Grant Whitmore		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
6		10/30/18	Mindy Lees*	Marisa Kollias; Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes	Toni Martinez; Grant Whitmore		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
7		10/30/18	Mindy Lees*	Marisa Kollias; Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes	Toni Martinez; Grant Whitmore		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
8	NYDN00002178	10/30/18	Marisa Kollias	Jean Nechvatal	Maya Bordeaux; Timothy Knight; Ann Barnes; Toni Martinez; Mindy Lees*; Grant Whitmore		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
9		10/30/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
10	NYDN00002156	10/30/18	Mindy Lees*	Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
11		10/30/18	Mindy Lees*	Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
12	NYDN00002145	10/30/18	Marisa Kollias	Mindy Lees*	Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes; Toni Martinez; Grant Whitmore		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
13	NYDN00002344	10/30/18	Toni Martinez	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
14		10/30/18	Marisa Kollias	Mindy Lees*; Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes	Toni Martinez; Grant Whitmore		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
15	NYDN00002192	10/30/18	Toni Martinez	Marisa Kollias	Mindy Lees*; Jean Nechvatal; Maya Bordeaux; Timothy Knight; Ann Barnes; Grant Whitmore		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
16		10/31/18	Mindy Lees*	Toni Martinez			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
17		10/31/18	Mindy Lees*	Toni Martinez			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
18		10/31/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
19		10/31/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
20		10/31/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
21		10/31/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
22		10/31/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
23		10/31/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
24		10/31/18	Mindy Lees*	Justin Dearborn; Julie Xanders*; Terry Jimenez; Timothy Knight; Marisa Kollias			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
25		10/31/18	Mindy Lees*	Justin Dearborn; Julie Xanders*; Terry Jimenez; Timothy Knight; Marisa Kollias			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
26		10/31/18	Terry Jimenez	Mindy Lees*	Justin Dearborn; Julie Xanders*; Timothy Knight; Marisa Kollias		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
27		10/31/18	Mindy Lees*	Matthew Leish; Marci Sweren*			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
28		10/31/18	Justin Dearborn	Mindy Lees*	Julie Xanders*; Marisa Kollias; Terry Jimenez		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
29		10/31/18	Julie Xanders*	Mindy Lees*			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
30		10/31/18	Timothy Knight	Justin Dearborn; Mindy Lees*	Julie Xanders*; Marisa Kollias; Terry Jimenez		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
31		10/31/18	Mindy Lees*	Matthew Leish; Marci Sweren*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
32		10/31/18	Timothy Knight	Justin Dearborn; Mindy Lees*	Julie Xanders*; Marisa Kollias; Terry Jimenez		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
33		11/1/18	Marisa Kollias	Timothy Knight; Justin Dearborn; Mindy Lees*	Julie Xanders*; Terry Jimenez		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
34		11/1/18	Marci Sweren*	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
35		11/1/18	Mindy Lees*	Ginger Otis; Robert York; Grant Whitmore	Toni Martinez; Maya Bordeaux		Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
36		11/1/18	Mindy Lees*	Ginger Otis; Robert York; Grant Whitmore	Toni Martinez; Maya Bordeaux		Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
37		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
38		11/1/18	Grant Whitmore	Mindy Lees*	Ginger Otis; Robert York; Toni Martinez; Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
39		11/1/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
40		11/1/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
41		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
42		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
43		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
44		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
45		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
46		11/1/18	Mindy Lees*	Maya Bordeaux			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
47		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
48		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
49		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
50		11/1/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
51		11/1/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
52		11/1/18	Matthew Leish	Mindy Lees*	Marci Sweren*		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
53		11/1/18	Mindy Lees*	Matthew Leish			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
54		11/1/18	Mindy Lees*	Matthew Leish			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
55		11/3/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
56		11/3/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
57	NYDN00002129	11/3/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
58		11/3/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
59	NYDN00002283	11/5/18	Robert Zisel	Mindy Lees*	Kevin Golen; Robert Zisel		Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
60		11/5/18	Toni Martinez	Jean Nechvatal; Mindy Lees*; Maya Bordeaux			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
61		11/5/18	Maya Bordeaux	Toni Martinez; Jean Nechvatal; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
62		11/5/18	Mindy Lees*	Robert Zisel; Kevin Golen			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
63		11/5/18	Robert Zisel	Mindy Lees*; Kevin Golen			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
64		11/5/18	Mindy Lees*	Robert Zisel			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
65		11/5/18	Mindy Lees*	Robert Zisel			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
66		11/5/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
67		11/5/18	Mindy Lees*	Robert Zisel			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
68		11/5/18	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
69		11/5/18	Jean Nechvatal	Maya Bordeaux			Email chain reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
70		11/5/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
71		11/5/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
72		11/5/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
73		11/5/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
74		11/5/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
75		11/5/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
76		11/5/18	Mindy Lees*	Maya Bordeaux	Toni Martinez		Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
77		11/5/18	Mindy Lees*	Maya Bordeaux	Toni Martinez		Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
78		11/5/18	Maya Bordeaux	Mindy Lees*	Toni Martinez		Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
79		11/5/18	Maya Bordeaux	Mindy Lees*	Toni Martinez		Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
80		11/5/18	Maya Bordeaux	Mindy Lees*			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
81		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
82		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
83		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
84		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
85		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
86		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
87		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
88		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
89		11/6/18	Toni Martinez	Maya Bordeaux	Mindy Lees*		Email chain reflecting legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
90		11/6/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
91		11/6/18	Toni Martinez	Maya Bordeaux	Mindy Lees*		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
92		11/6/18	Mindy Lees*	Kevin Golen; Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
93		11/6/18	Mindy Lees*	Kevin Golen; Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
94		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
95		11/6/18	Mindy Lees*	Toni Martinez; Maya Bordeaux			Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
96		11/6/18	Toni Martinez	Mindy Lees*	Maya Bordeaux		Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
97		11/6/18	Mindy Lees*	Toni Martinez	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
98		11/6/18	Mindy Lees*	Toni Martinez	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
99		11/6/18	Robert Zisel	Mindy Lees*; Kevin Golen			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
100		11/6/18	Mindy Lees*	Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
101		11/6/18	Mindy Lees*	Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
102		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
103		11/6/18	Toni Martinez	Mindy Lees*	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
104		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
105		11/6/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
106		11/6/18	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
107		11/6/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
108		11/6/18	Toni Martinez	Mindy Lees*			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
109		11/6/18	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
110		11/6/18	Julie Xanders*	Maya Bordeaux			Email providing legal advice from outside counsel Eric Hoffman* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
111		11/6/18	Mindy Lees*	Robert Zisel; Kevin Golen			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
112		11/6/18	Maya Bordeaux	Julie Xanders*			Email chain providing legal advice from outside counsel Eric Hoffman* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
113		11/6/18	Maya Bordeaux	Julie Xanders*			Email chain providing legal advice from outside counsel Eric Hoffman* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
114		11/6/18	Kevin Golen	Mindy Lees*; Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
115		11/6/18	Mindy Lees*	Kevin Golen; Robert Zisel			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
116		11/7/18	Robert Zisel	Mindy Lees*	Kevin Golen; Lane Kehler		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
117		11/7/18	Matthew Leish	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
118	NYDN00002148	11/7/18	Mindy Lees*	Robert Zisel	Kevin Golen; Lane Kehler		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
119		11/7/18	Mindy Lees*	Robert Zisel	Kevin Golen; Lane Kehler	Maya Bordeaux	Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
120	NYDN00002325	11/7/18	Mindy Lees*	Robert Zisel	Kevin Golen; Lane Kehler	Maya Bordeaux	Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
121		11/7/18	Mindy Lees*	Matthew Leish			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
122		11/7/18	Mindy Lees*	Matthew Leish			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
123		11/7/18	Matthew Leish	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
124		11/8/18	Robert Zisel	Mindy Lees*	Kevin Golen; Lane Kehler		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
125		11/8/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
126		11/8/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
127		11/8/18	Robert Zisel	Mindy Lees*	Kevin Golen; Lane Kehler		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
128		11/13/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
129		11/13/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
130		11/14/18	Toni Martinez	Maya Bordeaux	Mindy Lees*		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
131		11/14/18	Maya Bordeaux	Toni Martinez	Mindy Lees*		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
132		11/14/18	Mindy Lees*	Maya Bordeaux; Toni Martinez			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
133		11/14/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
134		11/14/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
135		11/14/18	Mindy Lees*	Kevin Golen; Robert Zisel			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
136		11/14/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
137		11/14/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
138		11/14/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
139	NYDN00002304	11/15/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
140		11/15/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
141		11/15/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
142		11/15/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
143		11/26/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
144		11/27/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
145		11/27/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
146		11/28/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
147		11/28/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
148		12/4/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
149		12/4/18	Mindy Lees*	Maya Bordeaux			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
150		12/4/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
151		12/4/18	Mindy Lees*	Maya Bordeaux			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
152		12/4/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
153		12/4/18	Maya Bordeaux	Justin Dearborn			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
154		12/4/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
155		12/4/18	Justin Dearborn	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
156		12/5/18	Robert Zisel	Mindy Lees*			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
157		12/5/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
158		12/5/18	Mindy Lees*	Maya Bordeaux			of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
159		12/5/18	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
160		12/6/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
161		12/6/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
162		12/6/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
163		12/6/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
164		12/6/18	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
165		12/6/18	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
166		12/7/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
167		12/8/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
168		12/8/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
169		12/8/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
170	NYDN00002275	12/14/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
171	NYDN00002180	12/14/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
172	NYDN00002182	12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
173		12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
174	NYDN00002286	12/14/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
175	NYDN00002288	12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
176		12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
177		12/14/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
178		12/14/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
179		12/14/18	Maya Bordeaux	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
180	NYDN00002133	12/14/18	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
181	NYDN00002135	12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
182	NYDN00002163	12/14/18	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
183	NYDN00002165	12/14/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
184		12/14/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
185		12/14/18	Mindy Lees*	Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
405		10/15/1-					Email chain reflecting a request for legal advice from outside counsel Max Fischer* regarding the corrective action taken as a result of the D. D'Ambly investigation and	Privileged - Attorney/Client
186		12/15/18	Justin Dearborn	Maya Bordeaux	Terry Jimenez; Timothy Knight		the disciplinary policy and procedure. Email chain reflecting legal advice from outside counsel Max Fischer* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary	Communication Privileged - Attorney/Client
187		12/15/18	Maya Bordeaux	Justin Dearborn	Terry Jimenez; Timothy Knight		policy and procedure.	Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
188		12/15/18	Maya Bordeaux	Justin Dearborn	Terry Jimenez; Timothy Knight		Email chain reflecting legal advice from outside counsel Max Fischer* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
189		12/20/18	Robert Zisel	Mindy Lees*	Kevin Golen			Privileged - Attorney/Client Communication
190		12/20/18	Mindy Lees*	Maya Bordeaux				Privileged - Attorney/Client Communication
191		12/20/18	Mindy Lees*	Maya Bordeaux			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
192		12/20/18	Mindy Lees*	Robert Zisel	Kevin Golen		investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
193		12/20/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
194		12/20/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
195		12/20/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
196		12/21/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
197		12/21/18	Maya Bordeaux	Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
198		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
199		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
200		12/21/18	Mindy Lees*	David Smith			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
201		12/21/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
202		12/21/18	David Smith	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
203		12/21/18	Mindy Lees*	David Smith			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
204		12/21/18	Mindy Lees*	David Smith			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
205		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
206		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
207		12/21/18	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
208		12/21/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
209		12/26/18	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
210		12/29/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
211		12/29/18	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
212		12/29/18	Robert Zisel	Mindy Lees*	Kevin Golen		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
213		12/30/18	Mindy Lees*	Maya Bordeaux; Toni Martinez			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct. Email chain providing legal advice from in-	Privileged - Attorney/Client Communication
214		12/30/18	Mindy Lees*	Maya Bordeaux			house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
215		1/2/19	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
216		1/2/19	Bobby Zisel	Mindy Lees*	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
217		1/3/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
218		1/3/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
219		1/3/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
220		1/3/19	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
221		1/3/19	Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
222		1/3/19	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
223		1/3/19	Maya Bordeaux	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
224		1/3/19	Bobby Zisel	Mindy Lees*	Kevin Golen; Robert Zisel		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
225		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
226	NYDN00002117	1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
227	NYDN00002119		Mindy Lees*	Robert Zisel	Kevin Golen		Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
228		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
229		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
230		1/4/19	Bobby Zisel				Memorandum conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
231		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
232		1/4/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
233		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
234			Maya Bordeaux Mindy Lees*	Jean Nechvatal Maya Bordeaux			the investigation of D. D'Ambly's conduct. Email chain providing legal advice from in-	Privileged - Attorney/Client Communication Privileged - Attorney/Client Communication
236		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
237		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
238		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
239		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
240		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
241		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
242		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
243		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
244	NYDN00002196	1/4/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
245		1/4/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
246		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
247		1/4/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
248		1/6/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
249		1/7/19	Jean Nechvatal	Mindy Lees*	Maya Bordeaux		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
250	NYDN00001923	1/7/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct. Document reflecting legal advice from in-	Privileged - Attorney/Client Communication
251	NYDN00001924	1/7/19	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
252		1/7/19	Mindy Lees*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
253		1/7/19	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
254		1/7/19	Jean Nechvatal	Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
255		1/7/19	Mindy Lees*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
256			Mindy Lees*	Robert Zisel	Jean Nechvatal		Email requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
257		1/7/19	Jean Nechvatal	Mindy Lees*; Robert Zisel			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
258		1/7/19	Robert Zisel	Mindy Lees*	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
259		1/8/19	Jean Nechvatal	Robert Zisel; Mindy Lees*			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
260		1/8/19	Jean Nechvatal	Robert Zisel; Mindy Lees*			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
261		1/8/19	Robert Zisel	Jean Nechvatal; Mindy Lees*			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
262		1/8/19	Jean Nechvatal	Robert Zisel; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
263		1/8/19	Jean Nechvatal	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
264		1/8/19	Mindy Lees*	Jean Nechvatal			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
265		1/8/19	Jean Nechvatal	Mindy Lees*			of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
266		1/8/19	Mindy Lees*	Jean Nechvatal			of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
267		1/8/19	Mindy Lees*	Jean Nechvatal			of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
268		1/8/19	Jean Nechvatal	Mindy Lees*			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
269		1/8/19	Mindy Lees*	Jean Nechvatal			of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
270		1/8/19	Mindy Lees*	Jean Nechvatal			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
271	NYDN00002002	1/8/19	Jean Nechvatal	Mindy Lees*	Maya Bordeaux		Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
272	NYDN00002003	1/8/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
273		1/8/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
274		1/8/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
275		1/9/19	Jean Nechvatal	Mindy Lees*	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
276		1/9/19	Jean Nechvatal	Emily Ruffner			Non-responsive and not privileged parent email.	Not Privileged
277		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Work Product
278		1/9/19	Jean Nechvatal	Amy Boyles			Non-responsive and not privileged parent email. Document reflecting legal advice from in-	Not Privileged
279		1/9/19	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
280		1/9/19	Maya Bordeaux	Jean Nechvatal; Mindy Lees*			Email requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
281		1/9/19	Maya Bordeaux				Letter sent for legal review to in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
282		1/9/19	Jean Nechvatal	Amy Boyles			Non-responsive and not privileged parent email.	Not Privileged
283		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
284		1/9/19	Robert Zisel	Jean Nechvatal; Mindy Lees*	Kevin Golen; Robert Zisel		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
285		1/9/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
286		1/9/19	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
287		1/9/19	Maya Bordeaux	Justin Dearborn; Terry Jimenez; Timothy Knight			Email chain reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
288		1/9/19	Jean Nechvatal	Amy Boyles			Non-responsive and not privileged parent email.	Not Privileged

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
289		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
290		1/9/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
291		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
292		1/9/19	Jean Nechvatal	Victoria Rienks			Non-responsive and not privileged parent email.	Not Privileged
293		1/9/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
294		1/9/19	Mindy Lees*	Jean Nechvatal; Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
295		1/9/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
296		1/9/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
297		1/9/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
298		1/9/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
299		1/9/19	Mindy Lees*	Maya Bordeaux	Jean Nechvatal		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
300		1/9/19	Mindy Lees*	Maya Bordeaux	Jean Nechvatal		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
301		1/9/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
302		1/9/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
							Email chain providing legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary	Privileged - Attorney/Client
303		1/9/19	Maya Bordeaux	Jean Nechvatal			policy and procedure.	Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
304		1/9/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
305		1/10/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from inhouse counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
306		1/10/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
307		1/10/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
308		1/10/19	Jean Nechvatal	Maya Bordeaux			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
309		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
310		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
311		1/10/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
312		1/10/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
313		1/10/19	Jean Nechvatal	Maya Bordeaux	Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
314		1/10/19	Jean Nechvatal	Maya Bordeaux	Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
315		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
316		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
317		1/10/19	Jean Nechvatal	James Brill			Non-responsive and not privileged parent email.	Not Privileged
318		1/10/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
319		1/10/19	Mindy Lees*	Maya Bordeaux; Jean Nechvatal			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
320		1/10/19	Maya Bordeaux				Draft letter providing legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
321		1/10/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
322		1/10/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
323		1/10/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
324		1/11/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
325		1/11/19	Maya Bordeaux				Draft letter sent for legal review to in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
326		1/11/19	Jean Nechvatal	James Brill			the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
327		1/11/19	Maya Bordeaux				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
328		1/11/19	Maya Bordeaux				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
329		1/11/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
							Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy	Privileged - Attorney/Client
330		1/11/19	Maya Bordeaux	Jean Nechvatal	Mindy Lees*		and procedure.	Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
331		1/11/19	Jean Nechvatal	Maya Bordeaux	Mindy Lees*		Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
332		1/11/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
333		1/11/19	Maya Bordeaux				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
334		1/11/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
335		1/11/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
336	NYDN00002108	1/14/19	Jean Nechvatal	James Brill; Mindy Lees*			of threatening voicemails.	Privileged - Attorney/Client Communication
337	NYDN00002341	1/14/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
338		1/14/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
339		1/14/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
340		1/14/19	Robert Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
341		1/14/19	Mindy Lees*	Robert Zisel	Kevin Golen; Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
342		1/14/19	Robert Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
343		1/14/19	Jean Nechvatal	Mindy Lees*; Deb Hindin; Lynne Allen			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
344		1/14/19	Mindy Lees*	George Martin			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
345	NYDN00002161 to NYDN00002162	1/15/19	Jean Nechvatal	Maya Bordeaux; Mindy Lees*			Email requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
346	NYDN00002176 to NYDN00002177	1/15/19	Mindy Lees*	Jean Nechvatal; Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
347	NYDN00002159 to NYDN00002160	1/15/19	Jean Nechvatal	Mindy Lees*; Maya Bordeaux			Email chain reflecting legal advice from in- house counsel regarding the workplace safety policy and procedure.	Privileged - Attorney/Client Communication
348		1/15/19	Jean Nechvatal	Mindy Lees*			Email requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
349		1/15/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; Toni Martinez	George Martin; James Brill		Email requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
350		1/15/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; James Brill; Toni Martinez; George Martin			Email requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
351		1/15/19	George Martin	Jean Nechvatal	James Brill		Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
352		1/15/19	George Martin	Jean Nechvatal	James Brill		Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
353		1/15/19	Jean Nechvatal	George Martin	James Brill		Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
354		1/15/19	Jean Nechvatal	George Martin	James Brill		Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
355		1/15/19	George Martin	Jean Nechvatal			Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
356		1/16/19	George Martin	Jean Nechvatal			Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
357		1/16/19	Jean Nechvatal	George Martin			Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
358		1/16/19	Jean Nechvatal	George Martin			Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
359		1/16/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
360		1/16/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
361		1/16/19	Mindy Lees*	Jean Nechvatal; George Martin; Maya Bordeaux			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
362		1/16/19	Mindy Lees*	Jean Nechvatal; George Martin; Maya Bordeaux			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
363		1/16/19	Mindy Lees*	Jean Nechvatal; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
364		1/16/19	Ed Bushey	Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
365		1/16/19	Ed Bushey	Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
366		1/16/19	Mindy Lees*	Ed Bushey			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
367		1/16/19	Mindy Lees*	Jean Nechvatal; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
368			Maya Bordeaux				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Work Product
369	NYDN00001902	1/16/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
370	NYDN00001903	1/16/19	Mindy Lees*				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
371	NYDN00001904	1/16/19	Mindy Lees*				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Work Product
372		1/17/19	Ed Bushey	Jean Nechvatal; Mindy Lees*; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
373		1/17/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
374	NYDN00001912	1/17/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; James Brill; Maya Bordeaux	George Martin; Toni Martinez		Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure. Draft letter reflecting legal advice from in-	Privileged - Attorney/Client Communication
375	NYDN00001913	1/17/19	Maya Bordeaux				house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure. Draft letter reflecting legal advice from in-	Privileged - Attorney/Client Communication
376	NYDN00001914	1/17/19	Maya Bordeaux				policy and procedure.	Privileged - Attorney/Client Communication
377		1/17/19	Ed Bushey	Jean Nechvatal; Mindy Lees*; James Brill; Maya Bordeaux	George Martin; Toni Martinez		Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
378		1/17/19	Ed Bushey	Jean Nechvatal; Mindy Lees*; James Brill; Maya Bordeaux	George Martin; Toni Martinez		Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
379		1/17/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; James Brill; Maya Bordeaux	George Martin; Toni Martinez		Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
380	NYDN00001907	1/17/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; Toni Martinez; George Martin; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure. Draft letter reflecting legal advice from in-	Privileged - Attorney/Client Communication
381	NYDN00001909	1/17/19	Maya Bordeaux				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
382		1/17/19	Ed Bushey	Jean Nechvatal; Mindy Lees*; Toni Martinez; George Martin; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
383		1/17/19	James Brill	Ed Bushey; Jean Nechvatal; Mindy Lees*; Toni Martinez; George Martin; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
384		1/17/19	Jean Nechvatal	James Brill; Ed Bushey; Mindy Lees*; Toni Martinez; George Martin; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
385		1/18/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; Maya Bordeaux; James Brill; Toni Martinez	George Martin		Email requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
386		1/18/19	Maya Bordeaux				Draft memorandum sent for legal review to in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
387		1/18/19	Mindy Lees*	Jean Nechvatal	Ed Bushey; Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
388		1/18/19	Mindy Lees*	Jean Nechvatal	Ed Bushey; Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
389		1/18/19	Ed Bushey	Terry Jimenez			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
390		1/18/19	Ed Bushey	Mindy Lees*; Jean Nechvatal	Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
391		1/18/19	Jean Nechvatal	George Martin	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
392		1/18/19	George Martin	Jean Nechvatal			Email chain providing legal advice from inhouse counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
393		1/18/19	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
394		1/18/19	Jean Nechvatal	George Martin	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
395		1/18/19	Ed Bushey	George Martin; Jean Nechvatal	Maya Bordeaux; James Brill; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
396	NYDN00001910	1/18/19	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
397		1/18/19	Jean Nechvatal	George Martin	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
398		1/19/19	Mindy Lees*	George Martin; James Brill			Email providing legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
399		1/19/19	James Brill	George Martin			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
400		1/19/19	James Brill	Mindy Lees*; George Martin			Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
401		1/19/19	Mindy Lees*	James Brill	George Martin		Email chain providing legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
402		1/19/19	Mindy Lees*	James Brill	George Martin		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
403	NYDN00002298 to NYDN00002301	1/24/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
404	NYDN00002302	1/24/19	Jean Nechvatal	Ann Barnes; Toni Martinez; Mindy Lees*			Email chain requesting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
405	NYDN00002000 to NYDN00002001	1/24/19	Barnes, Ann	Jean Nechvatal; Toni Martinez; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
406	NYDN00001998 to NYDN00001999	1/24/19	Jean Nechvatal	Ann Barnes; Toni Martinez; Mindy Lees*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
407	NYDN00001919 to NYDN00001920	1/24/19	Mindy Lees*	Ann Barnes; Jean Nechvatal; Toni Martinez			Email chain providing legal advice from and prepared in anticipation of litigation by in- house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
408	NYDN00001921 to NYDN00001922	1/24/19	Barnes, Ann	Mindy Lees*; Jean Nechvatal; Toni Martinez			Email chain providing legal advice from and prepared in anticipation of litigation by in- house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
409	NYDN00002337 to NYDN00002340	1/24/19	Mindy Lees*	Jean Nechvatal; James Brill			Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
410	NYDN00001917 to NYDN00001918	1/24/19	Mindy Lees*	Ann Barnes; Jean Nechvatal; Toni Martinez			Email chain providing legal advice from and prepared in anticipation of litigation by in- house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
411	NYDN00002265	1/24/19	James Brill	Joshua Zuckerberg*			Email chain requesting legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
412	NYDN00002199	1/24/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
413	NYDN00002271 to NYDN00002274	1/24/19	Jean Nechvatal	Mindy Lees*; James Brill			Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
414	NYDN00001895 to NYDN00001896	1/24/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
415	NYDN00002254 to NYDN00002255	1/25/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
							Non-responsive and not privileged parent	
416			Jean Nechvatal Yasmin Firouzi	Toni Martinez			email. Document reflecting legal advice from inhouse counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Not Privileged Privileged - Attorney/Client Communication
418		1/29/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
419	NYDN00002261 to NYDN00002264	1/29/19	James Brill	Jean Nechvatal; Mindy Lees*			Email chain reflecting legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
420	NYDN00002333 to NYDN00002336	1/29/19	Mindy Lees*	James Brill; Jean Nechvatal			Email chain reflecting legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
421	NYDN00002347 to NYDN00002350	1/30/19	Jean Nechvatal	James Brill; Mindy Lees*			Email chain reflecting legal advice from inhouse counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
422		1/30/19	James Brill	Jean Nechvatal; Mindy Lees*	Joshua Zuckerberg*; Ann Barnes	James Brill	Email requesting legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
423		1/30/19	Brill, James	Jean Nechvatal; Mindy Lees*	Joshua Zuckerberg*; Ann Barnes		Email reflecting legal advice from and prepared in anticipation of litigation by inhouse counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
424	NYDN00002227 to NYDN00002228	1/30/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
425		1/30/19	Jean Nechvatal	James Brill; Mindy Lees*; Ann Barnes			Email chain requesting legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
426		1/30/19	Jean Nechvatal	James Brill; Mindy Lees*; Ann Barnes			Email chain requesting legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
427		1/30/19	Mindy Lees*	Jean Nechvatal; James Brill; Ann Barnes			Email chain providing legal advice from and prepared in anticipation of litigation by in- house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
428		1/30/19	Jean Nechvatal	Mindy Lees*	James Brill; Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by in- house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
429		1/30/19	Jean Nechvatal	Mindy Lees*	James Brill; Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by in- house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
430		1/30/19	James Brill	Jean Nechvatal; Mindy Lees*	Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by in- house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
431		1/30/19	Jean Nechvatal	James Brill	Mindy Lees*; Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by inhouse counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
432		1/30/19	Jean Nechvatal	James Brill	Mindy Lees*; Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
433		1/31/19	Mindy Lees*	James Brill; Jean Nechvatal	Ann Barnes		Email chain providing legal advice from and prepared in anticipation of litigation by inhouse counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
434		1/31/19	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
435		1/31/19	Joshua Zuckerberg*	Jean Nechvatal	Ann Barnes; Mindy Lees*; James Brill		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
404		. (0.1 (0.0					Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding	
436			Jean Nechvatal Yasmin Firouzi	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		the D. D'Ambly union grievance. Document reflecting legal advice from inhouse counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - ACC/WP Privileged - Attorney/Client Communication
438			Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
439		1/31/19	Jean Nechvatal				union grievance. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua	Privileged - Work Product
440		1/31/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua	Privileged - Work Product
441		1/31/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
442		1/21/10	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
442		1,31/13	LOUNY EIGH				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	Communication
443		1/31/19	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	Privileged - Work Product
444		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
445		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
446		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
-							Document sent for legal review to and	, and the second
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
447		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
447		1/51/15	Jean Necrivatai				Document sent for legal review to and	Trivileged Work Froudet
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
448		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
449		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
450		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
		-,,					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of in-house counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
454		1/21/10	Jean Nechvatal					Privileged - Work Product
451		1/31/19	Jean Nechvatai				union grievance.	Privileged - Work Product
							Letter sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of in-house counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
452		1/31/19	James Brill				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of in-house counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
453		1/31/19	James Brill				union grievance.	Privileged - Work Product
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
							D'Ambly investigation and the disciplinary	Privileged - Attorney/Client
454		1/31/10	Maya Bordeaux				policy and procedure.	Communication
737		1/31/13	inaya baracuux				Agreement sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of in-house counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
455		4/2-/	A D					Details and March Bandon
455		1/31/19	Ann Barnes				union grievance.	Privileged - Work Product
							Agreement sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of in-house counsel Joshua	1
							Zuckerberg* regarding the D. D'Ambly	
456		1/31/19	Ann Barnes				union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at	
							the direction of outside counsel regarding	
457		1/31/19	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		the D. D'Ambly union grievance.	Privileged - ACC/WP
							Document reflecting legal advice from in-	
458		1/21/10	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
456		1/31/19	Tasiiiii Tii Odzi				investigation of B. D Ambiy's conduct.	Communication
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
459		1/31/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
460		1/21/10	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
400		1/31/19	Jean Necrivatai				Document sent for legal review to and	Privileged - Work Product
l							prepared in anticipation of litigation at the	
1							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
461		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
462		1/21/10	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly	Privileged - Work Product
462		1/31/19	Jean Nechvatai				union grievance.	Privileged - Work Product
							Document conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
463		1/31/19	Bobby Zisel				the investigation of D. D'Ambly's conduct.	Communication
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
		. /0 /					Zuckerberg* regarding the D. D'Ambly	
464		1/31/19	Jean Nechvatal				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
465		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
l							prepared in anticipation of litigation at the	
l							direction of outside counsel Joshua	
465		4/24/20	Jana Nachustal				Zuckerberg* regarding the D. D'Ambly	Debilogod Work Conduct
466		1/31/19	Jean Nechvatal			 	union grievance. Document sent for legal review to and	Privileged - Work Product
1							prepared in anticipation of litigation at the	
l							direction of outside counsel Joshua	
l							Zuckerberg* regarding the D. D'Ambly	
467		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
İ							Document sent for legal review to and	
l							prepared in anticipation of litigation at the	
l							direction of outside counsel Joshua	
[_					Zuckerberg* regarding the D. D'Ambly	
468		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
l							Document sent for legal review to and	
l							prepared in anticipation of litigation at the direction of outside counsel Joshua	
1							Zuckerberg* regarding the D. D'Ambly	
469		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
		1,51/15		1	ı	ı	Briefunder	gea Work Floudet

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
470		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
471		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	,
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
472		1/31/19	Jean Nechvatal				union grievance.	Privileged - Work Product
472		1,51,15	Jean Neonvatai				Letter sent for legal review to and	Titileged Work Found
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
472		1/24/40	James Brill				Zuckerberg* regarding the D. D'Ambly	Detrillaged Mark Dreduct
473		1/31/19	James Brill	 		ļ	union grievance.	Privileged - Work Product
							Letter sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
474		1/31/19	James Brill				union grievance.	Privileged - Work Product
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
							D'Ambly investigation and the disciplinary	Privileged - Attorney/Client
475		1/31/19	Maya Bordeaux				policy and procedure.	Communication
							Agreement sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
476		1/31/19	Ann Barnes				union grievance.	Privileged - Work Product
		-,,					Agreement sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
477		1/21/10	Ann Barnes				Zuckerberg* regarding the D. D'Ambly	Privileged - Work Product
4//		1/31/19	Ann Barnes				union grievance.	Privileged - Work Product
							For all the land of the land of the land	
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at	
							the direction of outside counsel regarding	
478		1/31/19	Jean Nechvatal	Joshua Zuckerberg*			the D. D'Ambly union grievance.	Privileged - ACC/WP
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
479		1/31/19	Joshua Zuckerberg*	Jean Nechvatal			union grievance.	Privileged - ACC/WP
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at	
							the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
			Jean Nechvatal	Amy Boyles			union grievance.	Privileged - ACC/WP
480		2/1/10						

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
481		2/8/19	James Brill	Mindy Lees*; Jean Nechvatal	Joshua Zuckerberg*		Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
482		2/8/19	Mindy Lees*	James Brill; Jean Nechvatal	Joshua Zuckerberg*		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by in-house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
483		2/8/19	Joshua Zuckerberg*	James Brill	Mindy Lees*; Jean Nechvatal		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
484		2/8/19	Joshua Zuckerberg*	James Brill	Mindy Lees*; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
485		2/8/19	Mindy Lees*	Joshua Zuckerberg*; James Brill	Jean Nechvatal		Email chain providing legal advice from and prepared in anticipation of litigation by inhouse counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
486		2/8/19	Jean Nechvatal	Mindy Lees*; Joshua Zuckerberg*; James Brill			Email chain providing legal advice from and prepared in anticipation of litigation by in- house counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
487		2/23/19	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
488		2/23/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
489	NYDN00002175	2/26/19	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding corporate compliance.	Privileged - Attorney/Client Communication
490		2/27/19	Mindy Lees*	Julie Xanders*; Maya Bordeaux; Jean Nechvatal			Email providing legal advice from in-house counsel regarding corporate compliance. Memorandum providing legal advice from	Privileged - Attorney/Client Communication
491		2/27/19	Mindy Lees*				and prepared in anticipation of litigation by in-house counsel Mindy Lees* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
492	NYDN00002638	3/4/19	Jean Nechvatal	Ed Bushey; Mindy Lees*; George Martin; Toni Martinez; James Brill; Maya Bordeaux; Ann Barnes			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
493	NYDN00002639		Maya Bordeaux				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
494	NYDN0002640	3/4/19	Maya Bordeaux				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
495		3/4/19	Jean Nechvatal	Emily Ruffner; Toni Martinez; Yolanda Stevens; Julie Hart*			Email chain providing legal advice from in- house counsel Mindy Lees* regarding corporate compliance.	Privileged - Attorney/Client Communication
496		3/4/19	Mindy Lees*				Memorandum providing legal advice from and prepared in anticipation of litigation by in-house counsel Mindy Lees* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
497		3/4/19	Jean Nechvatal	Emily Ruffner; Toni Martinez; Yolanda Stevens; Julie Hart*			Email chain providing legal advice from in- house counsel Mindy Lees* regarding corporate compliance. Document reflecting legal advice from and	Privileged - Attorney/Client Communication
498		3/4/19	Mindy Lees*				prepared in anticipation of litigation by inhouse counsel Mindy Lees* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
499		3/5/19	Jean Nechvatal	Mindy Lees*; Ed Bushey; Maya Bordeaux; James Brill; Toni Martinez	George Martin		Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
500		3/5/19	Maya Bordeaux				policy and procedure.	Privileged - Attorney/Client Communication
501	NYDN0001841	3/11/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
502	NYDN00001887 to NYDN00001888	3/26/19	James Brill	Joshua Zuckerberg*			Email chain reflecting legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
503	NYDN00001889 to NYDN00001892	3/27/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
504	NYDN00001837 to NYDN00001840	3/27/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
505	NYDN00001897 to NYDN00001901	3/27/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
506	NYDN00001893 to NYDN00001894	4/4/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Email chain providing legal advice from and	
							prepared in anticipation of litigation at the	
507	NYDN00001885 to NYDN00001886	4/9/19	James Brill	Jean Nechvatal	Joshua Zuckerberg*		direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
307	NIDNOCCIOCO	7/3/13	Junes Brill	Scall Nectivatal	Joshda Zackerberg		b. b Ambly union grievance.	Thineged Acc, wi
							Email chain providing legal advice from and	
							prepared in anticipation of litigation at the	
							direction of in-house counsel Joshua	
	NYDN00002646 to						Zuckerberg* regarding the D. D'Ambly	
508	NYDN00002647	4/9/19	James Brill	Jean Nechvatal	Joshua Zuckerberg*		union grievance.	Privileged - ACC/WP
							Carallahain association local advise from and	
							Email chain providing legal advice from and prepared in anticipation of litigation by	
	NYDN00002488 to						outside counsel regarding the D. D'Ambly	
509	NYDN00002488 to	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		union grievance.	Privileged - ACC/WP
303		., .,						
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
	NYDN00002634 to						outside counsel regarding the D. D'Ambly	
510	NYDN00002636	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		union grievance.	Privileged - ACC/WP
							For the below of the total of the form	
							Email chain providing legal advice from and	
	NYDN00002643 to						prepared in anticipation of litigation at the direction of outside counsel regarding the	
511	NYDN00002643 to NYDN00002645	1/0/10	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		D. D'Ambly union grievance.	Privileged - ACC/WP
311	14151400002043	4/3/13	Jean Necrivatai	Joshua Zuckerberg	James Brill, Tolli Martinez		D. D Ambly union grievance.	Frivilegeu - ACC/WF
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
	NYDN00002454 to						outside counsel regarding the D. D'Ambly	
512	NYDN00002456	4/9/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		union grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
513	NYDN00002430 to NYDN00002432	4/0/10	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		outside counsel regarding the D. D'Ambly union grievance.	Drivilaged ACCAMP
513	N1DN00002432	4/3/13	Jean Necrivatar	JOSHUA ZUCKEI DEI g	James Billi, Tolli Martillez		dilion grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
							prepared in anticipation of litigation at the	
	NYDN00002648 to						direction of outside counsel regarding the	
514	NYDN00002650	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		D. D'Ambly union grievance.	Privileged - ACC/WP
1							Email chain conveying information to	
							facilitate the rendering of legal advice from and prepared in anticipation of litigation at	
	NYDN00002651 to						the direction of outside counsel regarding	
515	NYDN00002653	4/9/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		the D. D'Ambly union grievance.	Privileged - ACC/WP
5.55		., ., ., 23			, :		. ,	
							Email chain providing legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
516		5/17/19	Jean Nechvatal	Toni Martinez			investigation of D. D'Ambly's conduct.	Communication
							Document reflecting legal advice from in-	But the set Assess (6)
517		E /47/40	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
51/		5/1//19	Tasiiiii Fii Ouzi				investigation of D. D Ambly's conduct.	Communication
							Email chain providing legal advice from and	
[prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
518		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill		union grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
		= (0.0 (: -	Land Name and	landar 7 olarkarı	Laure Bell Tari Marri		outside counsel regarding the D. D'Ambly	Debits and ACC (ACC
519		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez	<u> </u>	union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
520		F/20/10	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
520		5/29/19	Jean Nechvatai	Joshua Zuckerberg*	James Brill; Toni Martinez		union grievance.	Privileged - ACC/WP
521		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
522		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
523		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
524		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
525		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
526		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
527		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
32/		5/25/19	3031100 ZUCKEIDEIG	Scur Neclivatai	Sames bini, Toni Martinez		union grievance.	i iviiegeu - ACC/ WF
528		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	James Brill; Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
529		5/29/19	James Brill	Joshua Zuckerberg*; Jean Nechvatal	Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
530		5/29/19	James Brill	Joshua Zuckerberg*; Jean Nechvatal	Toni Martinez		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
531		5/29/19	James Brill	Joshua Zuckerberg*; Jean Nechvatal	Toni Martinez		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly	
532		5/29/19	Joshua Zuckerberg*	James Brill; Jean Nechvatal	Toni Martinez		union grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
533		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	Toni Martinez; James Brill		outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
333		-,,						
							Document conveying information to facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
534		5/29/19	Bobby Zisel				the investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly	
535		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	Toni Martinez; James Brill			Privileged - ACC/WP
							Document conveying information to	
							facilitate the rendering of legal advice from	
536		5/29/19	Bobby Zisel				in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
							Email chain requesting information to facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
537		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	Toni Martinez; James Brill		outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
			_					
							Email chain providing legal advice from and prepared in anticipation of litigation by	
		F /20 /40	Land Market and all	Lada - Tarkarkara*	Total Administration of Bulling		outside counsel regarding the D. D'Ambly	Distance ACCAMP
538		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	Toni Martinez; James Brill		union grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly	
539		5/29/19	Jean Nechvatal	Joshua Zuckerberg*	Toni Martinez; James Brill		union grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly	
540		5/29/19	Joshua Zuckerberg*	Jean Nechvatal	Toni Martinez; James Brill		union grievance.	Privileged - ACC/WP
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly	
541		5/29/19	Jean Nechvatal	Robert Zisel	Joshua Zuckerberg*			Privileged - ACC/WP
		<u> </u>					Document sent for legal review to and prepared in anticipation of litigatoins at	
							the direction of outside counsel Joshua	
542		5/20/10	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
342		3/29/19	pean recuivatai				union gnevalice.	r iiviieged - WOIK Floudct
							Email chain providing legal advice from and prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
543		5/29/19	Jean Nechvatal	Joshua Zuckerberg*			union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
544		F /20 /10	Joshua Zuckerberg*	Jean Nechvatal			outside counsel regarding the D. D'Ambly	Detrillaged ACC/AND
544		5/29/19	Joshua Zuckerberg	Jean Nechvatai			union grievance.	Privileged - ACC/WP
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at	
							the direction of outside counsel regarding	
545		5/30/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez			the D. D'Ambly union grievance.	Privileged - ACC/WP
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
546		5/30/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
1							Email chain conveying information to	
1							facilitate the rendering of legal advice from	
1							and prepared in anticipation of litigation at the direction of outside counsel regarding	
547		5/30/19	Jean Nechvatal	Toni Martinez; Joshua Zuckerberg*			the D. D'Ambly union grievance.	Privileged - ACC/WP
T		-,,10		,			Document reflecting legal advice from	1022 239 2
							outside counsel Mindy Lees* regarding the	Privileged - Attorney/Client
548		5/30/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document reflecting legal advice from	
							outside counsel Mindy Lees* regarding the	
549		5/30/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
550		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	-5
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
551		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
552		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document conveying information to	
1							facilitate the rendering of legal advice from	
553		F/20/40	Robby Zicol				outside counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
553		5/30/19	Bobby Zisel	+			Document sent for legal review to and	Communication
1							prepared in anticipation of litigation at the	
1							direction of outside counsel Joshua	
1							Zuckerberg* regarding the D. D'Ambly	
554		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
1							prepared in anticipation of litigation at the	
1							direction of outside counsel Joshua	
555		5/20/10	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
333		3/30/19	Jean Nechivalai				Document sent for legal review to and	r iiviieged - WOIK Floudet
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
1							Zuckerberg* regarding the D. D'Ambly	
556		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
557		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
558		5/20/10	Jean Nechvatal				union grievance.	Privileged - Work Product
558		3/30/19	Jean Nechvatai				Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
559		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
333		2,00,20					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
560		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
		-,,					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
561		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	_
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
562		5/30/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Letter sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
563		5/30/19	James Brill				union grievance.	Privileged - Work Product
							Letter sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
564		5/30/19	James Brill				union grievance.	Privileged - Work Product
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	Determine the second second
565		E /20/40	Maria Dandaniii				D'Ambly investigation and the disciplinary	
565		5/30/19	Maya Bordeaux	<u> </u>			policy and procedure.	Communication
							Agreement sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
566		5/20/10	Ann Barnes				union grievance.	Privileged - Work Product
300		3/30/19	Anni parties	1			Agreement sent for legal review to and	r rivinegeu - work riouuct
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
567		5/30/19	Ann Barnes				union grievance.	Privileged - Work Product
307		3/30/19					a grievanicei	ged Tronk Todact
							Email chain requesting information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
568		5/30/19	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal		union grievance.	Privileged - ACC/WP
		2,20,13					Document reflecting legal advice from in-	-5
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
569		5/30/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
		-, -0, 13		1				

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							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
583		5/30/19	Jean Nechvatal				union grievance. Letter sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
584		5/30/19	James Brill				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
301		5,55,25					Letter sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
585		5/30/19	James Brill				union grievance.	Privileged - Work Product
							Document reflecting legal advice from in- house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
								Privileged - Attorney/Client
586		5/30/19	Maya Bordeaux				policy and procedure. Agreement sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
587		5/30/19	Ann Barnes				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
		.,,					Agreement sent for legal review to and	.0
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
588		5/30/19	Ann Barnes				union grievance.	Privileged - Work Product
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
589		5/30/19	Robert Zisel	Jean Nechvatal	Joshua Zuckerberg*		outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
303		3,30,13	Nobel Clifc.	Jean Neemata	2031dd Ederlei Dei g		Agreement sent for legal review to and	Titaleged Need, Wi
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
590		5/30/19	Robert Zisel				union grievance.	Privileged - Work Product
							Email chain requesting information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
591		5/20/10	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
231		3/30/19	Joshua Zuckerberg	INODERI ZISEI	Jean (4ec)(Vata)		amon grievance.	i iviiegeu - Acc/ Wr
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
							I	
592		5/31/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez			outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
592		5/31/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez			outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
592		5/31/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez			outside counsel regarding the D. D'Ambly union grievance. Email chain providing legal advice from and	Privileged - ACC/WP
592		5/31/19	Jean Nechvatal	Joshua Zuckerberg*; Toni Martinez			outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
592			Jean Nechvatal Joshua Zuckerberg*	Joshua Zuckerberg*; Toni Martinez Jean Nechvatal; Toni Martinez	James Brill		outside counsel regarding the D. D'Ambly union grievance. Email chain providing legal advice from and prepared in anticipation of litigation by	Privileged - ACC/WP Privileged - ACC/WP
					James Brill		outside counsel regarding the D. D'Ambly union grievance. Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	
					James Brill		outside counsel regarding the D. D'Ambly union grievance. Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance. Email chain providing legal advice from and prepared in anticipation of litigation by	
		5/31/19			James Brill James Brill		outside counsel regarding the D. D'Ambly union grievance. Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance. Email chain providing legal advice from and	

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
595		5/31/19	Joshua Zuckerberg*	Robert Zisel; Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
596		5/31/19	Robert Zisel	Joshua Zuckerberg*; Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
597		5/31/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
598		6/3/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
599		6/3/19	Joshua Zuckerberg*	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
600		6/3/19	Jean Nechvatal	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
601		6/3/19	Joshua Zuckerberg*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
602		6/3/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
603		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
604		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
605		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
606		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
607		6/5/19	Joshua Zuckerberg*	James Brill; Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
608		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
609		6/5/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
610		6/5/19	James Brill	Jean Nechvatal; Joshua Zuckerberg*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
611		6/5/19	Jean Nechvatal	Joshua Zuckerberg*; James Brill			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
612		6/5/19	Jean Nechvatal	Toni Martinez			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
613		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
614		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
615		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
616		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
617		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
618		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
619		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
620		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
621		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
622		6/5/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
623		6/5/19	Joshua Zuckerberg*	Robert Zisel	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
624		6/6/19	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
				Joshua Zuckerberg*; Toni Martinez; James			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding	
625 626			Jean Nechvatal Yasmin Firouzi	Brill			the D. D'Ambly union grievance. Document reflecting legal advice from inhouse counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - ACC/WP Privileged - ACC/WP
627		6/6/19	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the D. D'Ambly union grievance. Document sent for legal review to and prepared in anticipation of litigation at the direction of cuttide coursel legals.	Privileged - ACC/WP
628		6/6/19	Jean Nechvatal				direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
629		6/6/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
630		6/6/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document conveying information to	
							facilitate the rendering of legal advice from	
		C IC IA O	Bobby Zisel					Privileged - Attorney/Client
631		6/6/19	BODDY ZISEI				the investigation of D. D'Ambly's conduct. Document sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
632		6/6/10	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
032		0/0/19	Jean Nechvatai				Document sent for legal review to and	Frivileged - Work Froduct
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
633		6/6/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
033		0,0,13	Jean Necrivatai				Document sent for legal review to and	THINESEU WORKTOUGE
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
634		6/6/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
054		0/0/13	Jean Necilvatai				Document sent for legal review to and	THE REAL WORKT TOUGHT
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
635		6/6/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
033		0/0/13	Jean Necilvatai				Document sent for legal review to and	THE REAL WORKT TOUGHT
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
636		6/6/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
050		0,0,13	Jedin Hedinatai				Document sent for legal review to and	Thineged Work Found
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
637		6/6/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
		2,2,23					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
638		6/6/19	Jean Nechvatal				union grievance.	Privileged - Work Product
		., .,					Document sent for legal review to and	<u> </u>
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
639		6/6/19	Jean Nechvatal					Privileged - Work Product
							Document sent for legal review to and	-
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
640		6/6/19	Jean Nechvatal				union grievance.	Privileged - Work Product
		-, -, -					Letter sent for legal review to and	<u> </u>
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
641		6/6/19	James Brill					Privileged - Work Product
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Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
642		C/C/10	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
642		6/6/19	James Brill				Document reflecting legal advice from in-	Privilegea - Work Product
							house counsel Mindy Lees* regarding the corrective action taken as a result of the D.	
								Privileged - Attorney/Client
643		6/6/19	Maya Bordeaux				policy and procedure. Agreement sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
644		6/6/19	Ann Barnes				union grievance.	Privileged - Work Product
							Agreement sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
645		6/6/19	Ann Barnes				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
0.10		2/2/22						
							Email chain conveying information to facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
646		6/6/19	Jean Nechvatal	Robert Zisel; Joshua Zuckerberg*			outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
							-	
							Email chain conveying information to	
							facilitate the rendering of legal advice from and prepared in anticipation of litigation at	
				Joshua Zuckerberg*; James Brill; Toni			the direction of outside counsel regarding	
647		6/10/19	Jean Nechvatal	Martinez			the D. D'Ambly union grievance. Document reflecting legal advice from in-	Privileged - ACC/WP
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
648		6/10/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document reflecting legal advice from in-	
649		6/10/19	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
043		0,10,13	103111111002				Document sent for legal review to and	communication
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
650		6/10/19	Jean Nechvatal				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
651		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
652		6/10/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
								-
							Document conveying information to facilitate the rendering of legal advice from	
652		C/40/40	Dahhu Ziasi				in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
653		6/10/19	Bobby Zisel				the investigation of D. D'Ambly's conduct. Document sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
654		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
655		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
656		6/10/19	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
							Document sent for legal review to and	.0
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
657		6/10/19	Jean Nechvatal				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
658		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
659		6/10/10	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
029		6/10/19	Jean Nechvatai				Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
660		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
		6/40/40	La car Na charactel				Zuckerberg* regarding the D. D'Ambly	Data de Maria Davida de
661		6/10/19	Jean Nechvatal				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
662		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Letter sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
662		6/40/40	Lauren Belli				Zuckerberg* regarding the D. D'Ambly	Databased Wood Doods at
663		6/10/19	James Brill				union grievance. Letter sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
664		6/10/19	James Brill				union grievance.	Privileged - Work Product
							Document reflecting legal advice from in- house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
		- / · · ·	Maria Baratana				D'Ambly investigation and the disciplinary	Privileged - Attorney/Client
665		6/10/19	Maya Bordeaux				policy and procedure. Agreement sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
666		6/10/19	Ann Barnes				litigation.	Privileged - Work Product
							Agreement sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
667		6/10/19	Ann Barnes				litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
				Joshua Zuckerberg*; James Brill; Toni			and prepared in anticipation of litigation at the direction of outside counsel regarding	
668		6/10/10	Jean Nechvatal	Martinez			the D. D'Ambly union grievance.	Privileged - ACC/WP
000		0/10/19	Jean Necrivatai	Iviai tillez			Document reflecting legal advice from in-	Filvileged - ACC/ WF
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
669		6/10/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
003		2, 20, 20						
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
670		6/10/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
671		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
672		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
673		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
674		6/10/19	Bobby Zisel				the investigation of D. D'Ambly's conduct.	Communication
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
		- 4 4					Zuckerberg* regarding the D. D'Ambly	
675		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
676		6/40/40	In an Albania and				Zuckerberg* regarding the D. D'Ambly	Did it and Wash David at
676		6/10/19	Jean Nechvatal				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
677		6/10/10	Jean Nechvatal				union grievance.	Privileged - Work Product
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							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
678		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
270		-,, 13					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
679		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
		., .,=0					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
680		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
		5, 50, 15		1		1	1 0	-0

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	1
							direction of outside counsel Joshua	1
							Zuckerberg* regarding the D. D'Ambly	L
681		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
					1		Document sent for legal review to and	1
					1		prepared in anticipation of litigation at the	1
					1		direction of outside counsel Joshua	1
682		6/10/10	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
082		0/10/19	Jean Necrivatai		 	+	Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	1
							direction of outside counsel Joshua	1
					1		Zuckerberg* regarding the D. D'Ambly	1
683		6/10/19	Jean Nechvatal					Privileged - Work Product
- 003		0/10/13	Jean Neonvatar			 	Letter sent for legal review to and	Tribineged Work Toddet
							prepared in anticipation of litigation at the	1
. 1					1		direction of outside counsel Joshua	1
. 1					1		Zuckerberg* regarding the D. D'Ambly	1
684		6/10/19	James Brill		1			Privileged - Work Product
		-,, 10				1	Letter sent for legal review to and	
					1		prepared in anticipation of litigation at the	1
					1		direction of outside counsel Joshua	1
					1		Zuckerberg* regarding the D. D'Ambly	1
685		6/10/19	James Brill		1		union grievance.	Privileged - Work Product
							Document reflecting legal advice from in-	
					1		house counsel Mindy Lees* regarding the	1
					1		corrective action taken as a result of the D.	1
							D'Ambly investigation and the disciplinary	Privileged - Attorney/Client
686		6/10/19	Maya Bordeaux		1		policy and procedure.	Communication
							Agreement sent for legal review to and	
					1		prepared in anticipation of litigation at the	1
							direction of outside counsel Joshua	1
							Zuckerberg* regarding the D. D'Ambly	1
687		6/10/19	Ann Barnes					Privileged - Work Product
					1		Agreement sent for legal review to and	1
					1		prepared in anticipation of litigation at the	1
							direction of outside counsel Joshua	1
					1		Zuckerberg* regarding the D. D'Ambly	1
688		6/10/19	Ann Barnes					Privileged - Work Product
					1		Document sent for legal review to and	1
. 1							prepared in anticipation of litigation at the	1
					1		direction of outside counsel Joshua	1
600		C/40/-0	lean Nachuntal		1		Zuckerberg* regarding the D. D'Ambly	Debrillaged Mode Conduct
689		6/10/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Email chain requesting information to	
. 1					1		Email chain requesting information to	1
. 1							facilitate the rendering of legal advice from	1
					1		and prepared in anticipation of litigation by	1
690		6/12/10	lochua Zuckorhora*	Joan Nochyatal, James Brill, Toni Martines	1		outside counsel regarding the D. D'Ambly	Drivilaged ACCAMB
090		6/13/19	Joshua Zuckerberg*	Jean Nechvatal; James Brill; Toni Martinez			union grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
					1		prepared in anticipation of litigation at the	1
					1		direction of outside counsel regarding the	1
691		6/12/10	Toni Martinez	Joshua Zuckerberg*	Jean Nechvatal; James Brill			Privileged - ACC/WP
031		0/ 13/ 13	TOTH INGI GITEZ	position Edition Edition	Jean Nechvatal, James Billi		D. D Ambly union grievance.	Tivineged - Acc/ WF
							Email chain providing legal advice from and	
					1		prepared in anticipation of litigation at the	1
					1		direction of outside counsel regarding the	1
692		6/13/19	Toni Martinez	Joshua Zuckerberg*	Jean Nechvatal; James Brill		9 9	Privileged - ACC/WP

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
							Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the	
693		6/13/19	Toni Martinez	Joshua Zuckerberg*	Jean Nechvatal; James Brill		D. D'Ambly union grievance.	Privileged - ACC/WP
				<u> </u>				
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly	
694		6/13/19	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal; James Brill		union grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
695		6/13/19	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal; James Brill		union grievance.	Privileged - ACC/WP
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
696		6/13/19	James Brill	Joshua Zuckerberg*; Toni Martinez	Jean Nechvatal		union grievance.	Privileged - ACC/WP
							Email conveying information to facilitate	
							the rendering of legal advice from and	
							prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly	
697		6/13/19	James Brill	Joshua Zuckerberg*			union grievance.	Privileged - ACC/WP
		2, 22, 22					Memorandum conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
698		6/13/19	Michelle Sweeney				union grievance.	Privileged - Work Product
							Fuell shelp are resting to a least of the form	
							Email chain requesting legal advice from and prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
699		7/9/19	James Brill	Joshua Zuckerberg*; Julie Xanders*			union grievance.	Privileged - ACC/WP
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
700		7/29/19	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
700		1/25/15	Scan Necrivatai	Joshua Zuckerberg	Ann barnes, windy tees , sames brin		differ grievance.	Trivilegeu Accy Wi
							Document reflecting legal advice from in-	
704		7/20/40	Vanada Elasada				house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
701		7/29/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct. Document reflecting legal advice from in-	Communication
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
702		7/29/19	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
703		7/29/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
		,					Zuckerberg* regarding the D. D'Ambly	
704		7/29/19	Jean Nechvatal	-	1		union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
		= /0 - / -					Zuckerberg* regarding the D. D'Ambly	
705		7/29/19	Jean Nechvatal		1		union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Document conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
706		7/29/19	Bobby Zisel				the investigation of D. D'Ambly's conduct.	Communication
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
707		7/29/19	Jean Nechvatal				union grievance.	Privileged - Work Product
707		.,,					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
708		7/29/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
700		7/20/40	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly	Still and West Section
709		7/29/19	Jean Nechvatai				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
710		7/29/19	Jean Nechvatal				union grievance.	Privileged - Work Product
		, , ,					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
711		7/29/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
742		7/20/10	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
712		7/29/19	Jean Nechvatai				Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
713		7/29/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
714		7/29/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
715		7/20/40	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
/15		//29/19	pean ivectivatal				Document sent for legal review to and	r iiviiegeu - work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
716		7/29/19	Jean Nechvatal				union grievance.	Privileged - Work Product
							Letter sent for legal review to and	_
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
717		7/29/19	James Brill				union grievance.	Privileged - Work Product
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
			L					Privileged - Attorney/Client
718		7/29/19	Maya Bordeaux				policy and procedure.	Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
719		7/29/19	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
720		7/29/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
721		7/29/19	Ann Barnes				Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
722			Joshua Zuckerberg*	James Brill; Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
723		7/30/19	Ed Bushey	Joshua Zuckerberg*	James Brill; Julie Xanders*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
724		7/30/19	James Brill	Ed Bushey; Joshua Zuckerberg*	Julie Xanders*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
725		7/30/19	Julie Xanders*	James Brill; Ed Bushey; Joshua Zuckerberg*			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
726		7/30/19	Joshua Zuckerberg*	Julie Xanders*	James Brill; Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
727		7/30/19	James Brill	Joshua Zuckerberg*; Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
728		7/30/19	James Brill	Joshua Zuckerberg*; Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
729		7/30/19	Julie Xanders*	James Brill	Ed Bushey		Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
730		7/30/19	James Brill	Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
731		7/30/19	James Brill	Julie Xanders*	Ed Bushey		Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
732		7/30/19	Ed Bushey	James Brill			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
733		7/30/19	Ed Bushey	James Brill			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
734		7/30/19	James Brill	Ed Bushey			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
735		7/30/19	James Brill	Ed Bushey			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
736		7/31/19	James Brill	Joshua Zuckerberg*			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
737		8/7/19	Marie Green	Toni Martinez; Jean Nechvatal			Email chain requesting legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement. Draft letter sent for legal review to outside	Privileged - Attorney/Client Communication
738		8/7/19	Marie Green					Privileged - Attorney/Client Communication
739		8/7/19	Marie Green				counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
740		8/8/19	Toni Martinez	James Brill; Joshua Zuckerberg*			Email chain requesting legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
741		8/8/19	Marie Green				Draft agreement reflecting legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
742		8/8/19	Toni Martinez	Joshua Zuckerberg*; James Brill			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement. Draft agreement sent for legal review to	Privileged - Attorney/Client Communication
743		8/8/19	Marie Green				outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
744		8/8/19	Joshua Zuckerberg*	James Brill	Toni Martinez		Email providing legal advice from outside counsel regarding the D'Ambly settlement. Draft agreement providing legal advice	Privileged - Attorney/Client Communication
745		8/8/19	Joshua Zuckerberg*				from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement. Draft agreement providing legal advice	Privileged - Attorney/Client Communication
746		8/8/19	Joshua Zuckerberg*				from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement. Email chain requesting legal advice from	Privileged - Attorney/Client Communication
747		8/13/19	Toni Martinez	Joshua Zuckerberg*; James Brill			outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
748		8/13/19	Joshua Zuckerberg*	Toni Martinez	James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
749		8/13/19	James Brill	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
750		8/13/19	James Brill	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
751	NYDN00002497 to NYDN00002499	8/21/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
752	NYDN00002457 to NYDN00002460	8/26/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
753	NYDN00002424 to NYDN00002427	8/26/19	James Brill	Joshua Zuckerberg*	Toni Martinez		Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
754	NYDN00002605 to NYDN00002608	8/26/19	Toni Martinez	James Brill; Joshua Zuckerberg*			Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
755	NYDN00002419 to NYDN00002423	8/26/19	Joshua Zuckerberg*	Toni Martinez; James Brill			Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
756	NYDN00002351 to NYDN00002355	8/26/19	Toni Martinez	Joshua Zuckerberg*; James Brill			Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
757		8/27/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
758		8/27/19	Joshua Zuckerberg*				Draft agreement providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
759		8/29/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
760		8/29/19	Joshua Zuckerberg*				Draft agreement reflecting legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
761	NYDN00002386 to NYDN00002387	9/4/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
762	NYDN00002573 to NYDN00002573	9/9/19	Joshua Zuckerberg*	James Brill; Toni Martinez			Email providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
763		9/9/19	James Brill	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
764		9/9/19	James Brill	Joshua Zuckerberg*; Toni Martinez			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
765		9/9/19	Toni Martinez	James Brill	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
766		9/9/19	Toni Martinez	James Brill	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
767		9/9/19	Joshua Zuckerberg*	Toni Martinez; James Brill			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
768		9/10/19	Toni Martinez	James Brill	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
769		9/10/19	Toni Martinez	James Brill	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
770		9/10/19	James Brill	Toni Martinez	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
771		9/10/19	Joshua Zuckerberg*	Toni Martinez; James Brill			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
772		9/10/19	Joshua Zuckerberg*	Toni Martinez; James Brill			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
773		9/10/19	James Brill	Toni Martinez	Joshua Zuckerberg*		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
774	NYDN00002222 to NYDN00002225	9/17/19	James Brill	Toni Martinez; Marie Green			Email chain requesting information to facilitate the rendering of legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
775	NYDN00002492 to NYDN00002495	9/17/19	James Brill	Toni Martinez; Marie Green			Email chain requesting information to facilitate the rendering of legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
776	NYDN00002630 to NYDN00002633	9/17/19	Toni Martinez	James Brill; Marie Green			Email requesting information to facilitate the rendering of legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
777	NYDN00002250 to NYDN00002253	9/17/19	James Brill	Joshua Zuckerberg*			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D'Ambly settlement. Email chain conveying information to facilitate the rendering of legal advice from outside counsel regarding the D'Ambly	Privileged - ACC/WP Privileged - Attorney/Client
778	NYDN00002260	9/17/19	James Brill	Joshua Zuckerberg*			settlement.	Communication
779	NYDN00002357 to NYDN00002369	9/18/19	Joshua Zuckerberg*	Marie Green	Toni Martinez; James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
780	NYDN00002373 to NYDN00002385	9/18/19	Marie Green	Joshua Zuckerberg*	Toni Martinez; James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
781	NYDN00002398 to NYDN00002418	9/18/19	Joshua Zuckerberg*	Marie Green	Toni Martinez; James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
782	NYDN00002433 to NYDN00002453	9/18/19	Marie Green	Toni Martinez			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
783	NYDN00002609 to NYDN00002629	9/18/19	Toni Martinez	Joshua Zuckerberg*; Marie Green	James Brill		Email chain requesting legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
784	NYDN00002516 to NYDN00002551	9/18/19	Joshua Zuckerberg*	Toni Martinez	Marie Green; James Brill		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
785	NYDN00002229 to NYDN00002249	9/18/19	James Brill	Joshua Zuckerberg*; Marie Green	Toni Martinez		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
786	NYDN00002467 to NYDN00002487	9/18/19	James Brill	Joshua Zuckerberg*; Marie Green	Toni Martinez		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
787	NYDN00002584 to NYDN00002604	9/18/19	Toni Martinez	James Brill; Joshua Zuckerberg*; Marie Green			Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
788	NYDN00002201 to NYDN00002221	9/18/19	James Brill	Toni Martinez; Joshua Zuckerberg*; Marie Green			Email chain providing legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
789	NYDN00002552 to NYDN00002572	9/18/19	James Brill	Toni Martinez; Joshua Zuckerberg*; Marie Green			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D'Ambly settlement.	Privileged - ACC/WP
790		10/30/20	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
791		10/30/20	Maya Bordeaux				policy and procedure.	Privileged - Attorney/Client Communication
792		10/30/20	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
793		10/30/20	James Brill				Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
							Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
794		10/30/20	Ann Barnes				litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
795		10/30/20	Ann Barnes				litigation.	Privileged - Work Product
796		10/30/20	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
797		10/30/20	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
798		10/30/20	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct. Document reflecting legal advice from in-	Privileged - Attorney/Client Communication
799		10/30/20	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct. Document sent for legal review to and	Privileged - Attorney/Client Communication
800		10/30/20	Jean Nechvatal				prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
801		10/30/20	Jean Nechvatal				litigation.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
802			Jean Nechvatal				litigation. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	Privileged - Work Product
803			Jean Nechvatal				litigation. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	Privileged - Work Product
804		10/30/20	Jean Nechvatal				litigation. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	Privileged - Work Product
805		10/30/20	Jean Nechvatal				litigation. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph	Privileged - Work Product
806		10/30/20	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
907		10/20/20	Bobby 7:col				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
807		10/30/20	Bobby Zisel				the investigation of D. D'Ambly's conduct. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph	Communication
808		10/30/20	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding	
809		2/9/21	Toni Martinez	Joseph Mulherin*			the D. D'Ambly litigation.	Privileged - ACC/WP
810		2/9/21	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
811		2/9/21	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
812		2/9/21	Jean Nechvatal				litigation. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph	Privileged - Work Product
813		2/9/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
814		2/9/21	Jean Nechvatal				litigation.	Privileged - Work Product
		0 10 10 4					Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
815		2/9/21	Bobby Zisel				the investigation of D. D'Ambly's conduct. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph	Communication
816		2/9/21	Toni Martinez				Mulherin* regarding the D. D'Ambly litigation. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
817		2/9/21	Toni Martinez				litigation. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	Privileged - Work Product
818		2/9/21	Jean Nechvatal				litigation. Document sent for legal review to and prepared in anticipation of litigation at the	Privileged - Work Product
819		2/9/21	Jean Nechvatal				direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
820		2/9/21	Jean Nechvatal				litigation. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
821		2/9/21	Jean Nechvatal				litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	СС	всс	Log Description	Privilege Type
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
822		2/9/21	Toni Martinez				litigation.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
		2/0/24	Land Market Land				Mulherin* regarding the D. D'Ambly	Deliterate West Desident
823		2/9/21	Jean Nechvatal	+			litigation. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
824		2/9/21	Toni Martinez				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
		, , ,					Letter sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
825		2/9/21	James Brill				litigation.	Privileged - Work Product
							Letter sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
826		2/9/21	James Brill				litigation.	Privileged - Work Product
							Document reflecting legal advice from in- house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
827		2/0/21	Maya Bordeaux				D'Ambly investigation and the disciplinary	Privileged - Attorney/Client Communication
827		2/9/21	Maya Bordeaux				policy and procedure. Agreement sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
828		2/9/21	Ann Barnes				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
		, , ,					Agreement sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
829		2/9/21	Ann Barnes				litigation.	Privileged - Work Product
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
830	NYDN00002099 to NYDN00002106	2/9/21	Toni Martinez	Joshua Zuckerberg*; Joseph Mulherin*			outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
830	14151400002100	3/6/21	Tom Martinez	Joshua Zuckerberg , Joseph Mullierin			intigation.	r ivileged - ACC/ Wr
							Email chain providing legal advice from and	
							prepared in anticipation of litigation at the direction of outside counsel regarding the	
831		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			D. D'Ambly litigation.	Privileged - ACC/WP
							For all the formation of the first	
							Email chain conveying information to facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at	
		0/0:/-:					the direction of outside counsel regarding	
832		3/31/21	Jean Nechvatal	Joshua Zuckerberg*	Ann Barnes; Mindy Lees*; James Brill		the D. D'Ambly union grievance. Document reflecting legal advice from in-	Privileged - ACC/WP
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
833		3/31/21	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
834		3/31/21	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
835		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
		- 4 4					Mulherin* regarding the D. D'Ambly	
836		3/31/21	Jean Nechvatal				litigation. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
		2/24/24	Jean Nechvatal				Mulherin* regarding the D. D'Ambly	Det de end avende Des de en
837		3/31/21	Jean Nechvatai				litigation.	Privileged - Work Product
							Document conveying information to	
							facilitate the rendering of legal advice from	
838		2/21/21	Bobby Zisel				in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client Communication
838		3/31/21	BODDY Zisei				the investigation of D. D'Ambly's conduct. Document sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
839		2/21/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
659		3/31/21	Jean Nechvatai				Document sent for legal review to and	Frivilegeu - Work Froduct
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
840		2/21/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
840		3/31/21	јеан неспуата				Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
841		2/21/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
841		3/31/21	јеан неспуата				Document sent for legal review to and	Privilegea - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
842		2/21/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
842		3/31/21	Jean Nechvatai				Document sent for legal review to and	Frivilegeu - Work Froduct
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
843		2/21/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
043		3/31/21	pean recuivatai				Document sent for legal review to and	i rivilegeu - vvoik rituuutt
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
844		3/31/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
044		3/31/21	Jean Nechvatal				Document sent for legal review to and	THINESEU WORKTOUGE
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
845		3/31/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
343		3,31,21					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
846		3/31/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
040		5/51/21	- Convatai				Document sent for legal review to and	eged WorkTroduct
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
847		3/31/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
047		3/31/21	pean receivatai	<u> </u>		l .	magazioni.	cgcu work i louuct

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
848		3/31/21	James Brill				litigation.	Privileged - Work Product
							Letter sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
		2/21/21					Mulherin* regarding the D. D'Ambly	
849		3/31/21	James Brill				litigation. Document reflecting legal advice from in-	Privileged - Work Product
							house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
850		3/31/21	Maya Bordeaux				D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
030		3,31,21	inaya boracaax				Agreement sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
851		3/31/21	Ann Barnes				litigation.	Privileged - Work Product
							Agreement sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
852		3/31/21	Ann Barnes				litigation.	Privileged - Work Product
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
853		3/31/21	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at the direction of outside counsel regarding	
854		3/31/21	Jean Nechvatal	Joshua Zuckerberg*	Barnes, Ann; Mindy Lees*; James Brill		the D. D'Ambly union grievance.	Privileged - ACC/WP
							Document reflecting legal advice from in-	Drivilla and Attornous/Client
855		3/31/21	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
		, ,						
							Document reflecting legal advice from in-	Debit land Aller and Clinate
856		3/31/21	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
-30		5,51/21					Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
857		3/31/21	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
858		3/31/21	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
859		3/31/21	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
860		3/31/21	Bobby Zisel				the investigation of D. D'Ambly's conduct.	Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
861		3/31/21	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
862		3/31/21	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
							Document sent for legal review to and	-
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
863		3/31/21	Jean Nechvatal				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
864		3/31/21	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
865		3/31/21	Jean Nechvatal				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
866		3/31/21	Jean Nechvatal				union grievance.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
867		3/31/21	Jean Nechvatal				union grievance. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
868		3/31/21	Jean Nechvatal				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
							Document sent for legal review to and	- C
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
869		3/31/21	Jean Nechvatal				union grievance.	Privileged - Work Product
							Letter sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joshua	
870		3/31/21	James Brill				Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
		5/52/22					Letter sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joshua	
							Zuckerberg* regarding the D. D'Ambly	
871		3/31/21	James Brill				union grievance.	Privileged - Work Product
							Document reflecting legal advice from in- house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
872		2/21/21	Maya Bordeaux				D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
0/2		3/31/21	iviaya burucaux				Agreement sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
873		3/31/21	Ann Barnes				union grievance.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Agreement sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
874		3/31/21	Ann Barnes				union grievance.	Privileged - Work Product
875		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
							Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the	
876		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			D. D'Ambly litigation.	Privileged - ACC/WP
							Email reflecting legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the	
877		3/31/21	James Brill	Jean Nechvatal; Mindy Lees*	Joshua Zuckerberg*; Ann Barnes		D. D'Ambly litigation. Document sent for legal review to and	Privileged - ACC/WP
							prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
878		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
							Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
879		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
880		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
							Letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
881		3/31/21	James Brill				litigation. Email chain providing legal advice from inhouse counsel regarding the corrective action taken as a result of the D. D'Ambly	Privileged - Work Product
882		3/31/21	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
883		3/31/21	Jean Nechvatal				litigation. Email chain providing legal advice from inhouse counsel regarding the corrective action taken as a result of the D. D'Ambly	Privileged - Work Product
884		3/31/21	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
					Maya Pordonyu James Seilli Tesi Meriti		Email chain providing legal advice from inhouse counsel regarding the corrective action taken as a result of the D. D'Ambly	Privileged Atterney/Client
885		3/31/21	Ed Bushey	Mindy Lees*; Jean Nechvatal	Maya Bordeaux; James Brill; Toni Martinez; George Martin		investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph	
886		3/31/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
887		3/31/21	Ann Barnes				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
								-
888	NYDN00002077	3/31/21	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
889		3/31/21	George Martin	Jean Nechvatal	Maya Bordeaux; James Brill; Ed Bushey; Toni Martinez; Mindy Lees*		Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
890		3/31/21	Ed Bushey	Mindy Lees*; Jean Nechvatal	Maya Bordeaux; James Brill; Toni Martinez; George Martin		Email chain providing legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
891		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
892			Mindy Lees*	Jean Nechvatal; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
893			Maya Bordeaux				Draft letter sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
894			Mindy Lees*	Jean Nechvatal; George Martin; Maya Bordeaux			Email providing legal advice from in-house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	-
895			Martin, George	Jean Nechvatal			Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
896		3/31/21	Jean Nechvatal				litigation. Email chain requesting legal advice from in-	Privileged - Work Product
897		2/24/24	Martin, George	Jean Nechyatal	James Brill		house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
93/				Jean Nechvatal	panies Dilli		Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	Communication
898			Mindy Lees*				litigation. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	Privileged - Work Product
899		3/31/21	Jean Nechvatal				litigation. Email chain conveying information to facilitate the rendering of legal advice from	Privileged - Work Product
900		3/31/21	Bobby Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
901		3/31/21	Mindy Lees*	Jean Nechvatal; Ed Bushey; George Martin; Toni Martinez; James Brill; Maya Bordeaux			Email chain requesting legal advice from in- house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
902		3/31/21	Maya Bordeaux				Draft letter reflecting legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
903		3/31/21	Mindy Lees*	Jean Nechvatal; George Martin; Maya Bordeaux			Email providing legal advice from in-house counsel regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
904		3/31/21	George Martin	Jean Nechvatal	James Brill		Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
905		3/31/21	George Martin	Jean Nechvatal			Email chain requesting legal advice from in- house counsel Mindy Lees* regarding the investigation of threatening voicemails.	Privileged - Attorney/Client Communication
906		3/31/21	Robert Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
907		3/31/21	Jean Nechvatal	Toni Martinez	Joseph Mulherin*		Email chain providing legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - ACC/WP
							Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
908			Martin, George Jean Nechvatal	Jean Nechvatal	Ed Bushey		litigation. Document for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambiy litigation.	Privileged - Work Product Privileged - Work Product
		-,,					Email conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	<u> </u>
910		3/31/21	Martin, George	Ed Bushey			litigation. Document conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	Privileged - Work Product
911		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
912		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
							Document conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at the direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
913		3/31/21	Jean Nechvatal				litigation.	Privileged - ACC/WP
							Email conveying information to facilitate	
							the rendering of legal advice from and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
014		2/24/24	Adoutto on Tout	Land Name and Ed Burkey			Mulherin* regarding the D. D'Ambly	Data Harris A GC (AMD
914		3/31/21	Martinez, Toni	Jean Nechvatal; Ed Bushey			litigation. Document conveying information to	Privileged - ACC/WP
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at	
							the direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
915		3/31/21	James Brill				litigation.	Privileged - ACC/WP
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at the direction of in-house counsel regarding	
916		3/31/21	Bobby Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal			Privileged - ACC/WP
310		-,,						The state of the s
							Document for legal review to and prepared	
							in anticipation of litigation at the direction	
							of outside counsel Joseph Mulherin*	
917		3/31/21	Jean Nechvatal				regarding the D. D'Ambly litigation.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
918		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
		-,-,-					Document conveying information to	-0
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation at	
							the direction of outside counsel Joseph	
		0/04/04					Mulherin* regarding the D. D'Ambly	
919		3/31/21	Jean Nechvatal				litigation. Email providing legal advice from in-house	Privileged - ACC/WP
							counsel regarding the corrective action	
							taken as a result of the D. D'Ambly	
							investigation and the disciplinary policy	Privileged - Attorney/Client
920	<u> </u>	3/31/21	Mindy Lees*	Maya Bordeaux; Jean Nechvatal			and procedure.	Communication
ĺ								
							Droft letter was did no level advis - 5	
							Draft letter providing legal advice from Mindy Lees* regarding the corrective	
							action taken as a result of the D. D'Ambly	
			1	1	1	1	faction taken as a result of the D. D Allibly	1
	l						investigation and the disciplinary policy	Privileged - Attorney/Client

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Franklinger of the second on the facilitate	
							Email conveying information to facilitate the rendering of legal advice from in-house	
							counsel regarding the corrective action	
							taken as a result of the D. D'Ambly	Dri ilana da Assana (Cliana
922		3/31/21	Barnes, Ann	Jean Nechvatal	James Brill; Mindy Lees*; Toni Martinez		investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
					, , , , , , , , , , , , , , , , , , , ,		Agreement sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
923		3/31/21	Ann Barnes				litigation.	Privileged - Work Product
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel regarding the	Privileged - Attorney/Client
924		3/31/21	Bobby Zisel	Mindy Lees*	Kevin Golen; Jean Nechvatal		investigation of D. D'Ambly's conduct.	Communication
							Email providing legal advice from in-house	
							counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D. D'Ambly investigation and the disciplinary	Privileged - Attorney/Client
925		3/31/21	Mindy Lees*	Maya Bordeaux; Jean Nechvatal			policy and procedure.	Communication
							Draft letter reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the corrective action taken as a result of the D.	
								Privileged - Attorney/Client
926		3/31/21	Maya Bordeaux				policy and procedure.	Communication
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel regarding the	Privileged - Attorney/Client
927	NYDN00002082	3/31/21	Ann Barnes	Jean Nechvatal	James Brill; Mindy Lees*; Toni Martinez		investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from and	
							prepared in anticipation of litigation at the	
928		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			direction of outside counsel regarding the D. D'Ambly litigation.	Privileged - ACC/WP
							Email chain conveying information to	
							facilitate the rendering of legal advice from	Privileged - Attorney/Client
929		3/31/21	Robert Zisel	Jean Nechvatal; Mindy Lees*	Kevin Golen; Robert Zisel		in-house counsel regarding the investigation of D. D'Ambly's conduct.	Communication
		.,.,.						
							Document for legal review to and prepared in anticipation of litigation at the direction	
							of outside counsel Joseph Mulherin*	
930		3/31/21	Jean Nechvatal				regarding the D. D'Ambly litigation.	Privileged - Work Product
							Email requesting legal advice from in- house counsel regarding the corrective	
							action taken as a result of the D. D'Ambly	
		_					investigation and the disciplinary policy	Privileged - Attorney/Client
931		3/31/21	Maya Bordeaux	Jean Nechvatal; Mindy Lees*	<u> </u>		and procedure. Draft letter reflecting legal advice from in-	Communication
							house counsel Mindy Lees* regarding the	
							corrective action taken as a result of the D.	
932		3/31/21	Maya Bordeaux				D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
332		3/31/21	maya bordedax	<u> </u>	<u> </u>		Document sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
933		3/31/21	Jean Nechvatal	Jean Nechvatal			litigation.	Privileged - Work Product
933		3/31/21	Jean Nechvatal	Jean Nechvatal			Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
024		2/21/21	Mindy Lees*	Jaco Naskustal	Maria Paralasani		Email chain providing legal advice from in- house counsel regarding the investigation	Privileged - Attorney/Client Communication
934		3/31/21	Mindy Lees	Jean Nechvatal	Maya Bordeaux		of D. D'Ambly's conduct.	Communication
							Document reflecting legal advice from in-	
935		2/21/21	Yasmin Firouzi				house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
935		3/31/21	rasmin Firouzi				investigation of D. D Ambly's conduct.	Communication
							Document for legal review to and prepared	
							in anticipation of litigation at the direction	
936		3/31/21	Jean Nechvatal				of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
330		3/31/21	Jean Necrivatai				Email chain conveying information to	Thirtieged Work Floddet
							facilitate the rendering of legal advice from	
		0 /0 4 /0 4					in-house counsel regarding the	Privileged - Attorney/Client
937		3/31/21	Robert Zisel	Jean Nechvatal; Mindy Lees*			investigation of D. D'Ambly's conduct.	Communication
							Document for legal review to and prepared	
							in anticipation of litigation at the direction	
							of outside counsel Joseph Mulherin*	
938		3/31/21	Jean Nechvatal				regarding the D. D'Ambly litigation. Email chain requesting information to	Privileged - Work Product
							facilitate the rendering of legal advice from	
							in-house counsel regarding the	Privileged - Attorney/Client
939		3/31/21	Robert Zisel	Mindy Lees*	Jean Nechvatal		investigation of D. D'Ambly's conduct.	Communication
							Document for legal review to and prepared in anticipation of litigation at the direction	
							of outside counsel Joseph Mulherin*	
940		3/31/21	Jean Nechvatal				regarding the D. D'Ambly litigation.	Privileged - Work Product
							Email chain conveying information to facilitate the rendering of legal advice from	
							in-house counsel regarding the	Privileged - Attorney/Client
941		3/31/21	Robert Zisel	Jean Nechvatal; Mindy Lees*	Kevin Golen; Bobby Zisel		investigation of D. D'Ambly's conduct.	Communication
							Email requesting legal advice from in- house counsel regarding the corrective	
							action taken as a result of the D. D'Ambly	
							investigation and the disciplinary policy	Privileged - Attorney/Client
942		3/31/21	Maya Bordeaux	Jean Nechvatal; Mindy Lees*			and procedure.	Communication
							Draft letter reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the corrective action taken as a result of the D.	
								Privileged - Attorney/Client
943		3/31/21	Maya Bordeaux				policy and procedure.	Communication
							Franklichein annuning in franklich	
							Email chain conveying information to facilitate the rendering of legal advice from	
							in-house counsel regarding the	Privileged - Attorney/Client
944		3/31/21	Robert Zisel	Mindy Lees*; Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from in- house counsel regarding the investigation	Privileged - Attorney/Client
945		3/31/21	Mindy Lees*	Jean Nechvatal	Maya Bordeaux		of D. D'Ambly's conduct.	Communication
		-,,			,		Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
946		3/31/21	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Email chain requesting information to	
							facilitate the rendering of legal advice from	
							in-house counsel regarding the	Privileged - Attorney/Client
947		3/31/21	Robert Zisel	Mindy Lees*	Jean Nechvatal		investigation of D. D'Ambly's conduct.	Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Email chain providing legal advice from and	
							prepared in anticipation of litigation by	
							outside counsel Joseph Mulherin*	
948		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			regarding the D. D'Ambly litigation.	Privileged - ACC/WP
							Email requesting information to facilitate	
							the rendering of legal advice from in-house	
							counsel regarding the investigation of D.	Privileged - Attorney/Client
949		3/31/21	Mindy Lees*	Robert Zisel	Jean Nechvatal		D'Ambly's conduct.	Communication
							Email chain conveying information to	
							facilitate the rendering of legal advice from	I .
							in-house counsel regarding the	Privileged - Attorney/Client
950		3/31/21	Mindy Lees*	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Document conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
951		3/31/21	Bobby Zisel				the investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
952		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from in-	L
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
953		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
954		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
955		3/31/21	Maya Bordeaux	Jean Nechvatal			the investigation of D. D'Ambly's conduct.	Communication
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
956		3/31/21	Maya Bordeaux	Jean Nechvatal			the investigation of D. D'Ambly's conduct.	Communication
							Email chain reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
957		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
958		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
959		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
960		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
961		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
962		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
							Email requesting information to facilitate	1
							the rendering of legal advice from in-house	1
							counsel regarding the investigation of D.	Privileged - Attorney/Client
963		3/31/21	Mindy Lees*	Robert Zisel	Jean Nechvatal		D'Ambly's conduct.	Communication
								1
							Email chain providing legal advice from in-	1
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
964		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
904								

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
965		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
966		3/31/21	Mindy Lees*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
967		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
968	NYDN00002085	3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
969		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
970		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
971		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
972		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
973		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
974		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
975		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
976		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			Email chain providing legal advice from and prepared in anticipation of litigation by outside counsel regarding the D. D'Ambly litigation. Email chain requesting legal advice from	Privileged - ACC/WP
977		3/31/21	Marie Green	Toni Martinez; Jean Nechvatal			email chain requesting legal advice from outside counsel Joshua Zuckerberg* regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Draft agreement sent for legal review to	
							outside counsel Joshua Zuckerberg*	Privileged - Attorney/Client
978		3/31/21	Marie Green				regarding the D'Ambly settlement.	Communication
							Draft agreement sent for legal review to	
							outside counsel Joshua Zuckerberg*	Privileged - Attorney/Client
979		3/31/21	Jean Nechvatal				regarding the D'Ambly settlement.	Communication
		-,-,					Email chain conveying information to	
							facilitate the rendering of legal advice from	
							outside counsel regarding the D'Ambly	Privileged - Attorney/Client
980		3/31/21	Brill, James	Joshua Zuckerberg*; Jean Nechvatal	Ed Bushey		settlement.	Communication
300		-,,	,				Email chain requesting information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
981		3/31/21	Joshua Zuckerberg*	Bobby Zisel' [Robert Zisel]	Jean Nechvatal		union grievance.	Privileged - ACC/WP
301		0/01/21	Joshida Zadiker Beng	Sobby Elser (Nobel Cliser)	Jedin Nedin ded		Document for sent for legal review to and	Titileged Titely til
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
982		2/21/21	Joshua Zuckerberg*				litigation.	Privileged - Work Product
302		3/31/21	Joshua Zuckerberg	+		+	Email chain providing legal advice from and	r iiviiegea - Work Froudti
							prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
983		2/21/21	Brill, James	Jean Nechvatal; Joshua Zuckerberg*				Privileged - ACC/WP
983		3/31/21	Brill, James	Jean Nechvatar; Joshua Zuckerberg			union grievance. Email chain conveying information to	Privileged - ACC/WP
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
		2/24/24					outside counsel regarding the D. D'Ambly	
984		3/31/21	Bobby Zisel	Joshua Zuckerberg*	Jean Nechvatal		union grievance.	Privileged - ACC/WP
							Email chain requesting information to	
							facilitate the rendering of legal advice from	
							and prepared in anticipation of litigation by	
							outside counsel regarding the D. D'Ambly	
985		3/31/21	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal		union grievance.	Privileged - ACC/WP
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
986		3/31/21	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document reflecting legal advice from in-	
		2/24/24					house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
987		3/31/21	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Communication
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
988		3/31/21	Jean Nechvatal	1		-	litigation.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
000		a (a . !- :	land Nantanani				Mulherin* regarding the D. D'Ambly	Debits and Market 1
989		3/31/21	Jean Nechvatal	1			litigation.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
95-			l				Mulherin* regarding the D. D'Ambly	
990		3/31/21	Jean Nechvatal	1		1	litigation.	Privileged - Work Product
							Document conveying information to	
							facilitate the rendering of legal advice from	L
							outside counsel Mindy Lees* regarding the	
991		3/31/21	Bobby Zisel				investigation of D. D'Ambly's conduct.	Communication
				İ			Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
992			Jean Nechvatal					Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	ВСС	Log Description	Privilege Type
							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
993		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
204		2/21/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly	Privileged - Work Product
994		3/31/21	јеан неспуата				litigation. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
995		3/31/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
996		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
							Document sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
997		3/31/21	Jean Nechvatal				litigation.	Privileged - Work Product
							Document sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
998		3/31/21	Jean Nechvatal				litigation. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
		2/24/24	Lance Mandage And				Mulherin* regarding the D. D'Ambly	Delillared Wed Desdess
999		3/31/21	Jean Nechvatal				litigation. Document sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
1000		3/31/21	Jean Nechvatal				Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1000		3/31/21	Zean Neemata				Letter sent for legal review to and	Timeged Weint Todder
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
1001		3/31/21	James Brill				litigation.	Privileged - Work Product
							Letter sent for legal review to and	
							prepared in anticipation of litigation at the direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
1002		3/31/21	James Brill				litigation.	Privileged - Work Product
							Document reflecting legal advice from in-	
							house counsel Mindy Lees* regarding the corrective action taken as a result of the D.	
							D'Ambly investigation and the disciplinary	Privileged - Attorney/Client
1003		3/31/21	Maya Bordeaux				policy and procedure.	Communication
							Agreement sent for legal review to and prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
1004		3/31/21	Ann Barnes				litigation. Agreement sent for legal review to and	Privileged - Work Product
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
4005		2/24/24	Ann Daving				Mulherin* regarding the D. D'Ambly	Daireilana d. Marte Draduct
1005		3/31/21	Ann Barnes			l	litigation.	Privileged - Work Product

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
							Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
1006		3/31/21	Joshua Zuckerberg*	Jean Nechvatal			union grievance.	Privileged - ACC/WP
1007		3/31/21	James Brill	Joshua Zuckerberg*; Jean Nechvatal	Ed Bushey		Email chain providing legal advice from outside counsel regarding the D'Ambly settlement.	Privileged - Attorney/Client Communication
1008		3/31/21	James Brill	Jean Nechvatal; Joshua Zuckerberg*			Email chain providing legal advice from outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
1009		3/31/21	Robert Zisel	Joshua Zuckerberg*	Jean Nechvatal		Email chain conveying information to facilitate the rendering of legal advice from outside counsel regarding the D. D'Ambly union grievance.	Privileged - Attorney/Client Communication
1010		3/31/21	Joshua Zuckerberg*	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from and prepared in anticipation of litigation at the direction of outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
1011		3/31/21	Joshua Zuckerberg*	Toni Martinez	Jean Nechvatal		Email chain requesting information to facilitate the rendering of legal advice from outside counsel regarding the D. D'Ambly union grievance.	Privileged - ACC/WP
1012		3/31/21	Yasmin Firouzi				Document reflecting legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1013		3/31/21	Yasmin Firouzi				investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1014		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1015		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly union grievance.	Privileged - Work Product
1016							Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joshua Zuckerberg* regarding the D. D'Ambly	
1016			Jean Nechvatal Bobby Zisel				union grievance. Memorandum conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Work Product Privileged - ACC/WP

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							facilitate the rendering of legal advice from	
							outside counsel regarding the D. D'Ambly	
1033		3/31/21	Jean Nechvatal				union grievance.	Privileged - ACC/WP
							Email chain reflecting legal advice from and	
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
1034		3/31/21	Jean Nechvatal	Toni Martinez; Joseph Mulherin*			litigation.	Privileged - ACC/WP
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
1035		3/31/21	Maya Bordeaux	Jean Nechvatal			the investigation of D. D'Ambly's conduct.	Communication
							Email chain providing legal advice from in-	
							house counsel regarding the investigation	Privileged - Attorney/Client
1036		3/31/21	Mindy Lees*	Maya Bordeaux			of D. D'Ambly's conduct.	Communication
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
1037		3/31/21	Maya Bordeaux	Jean Nechvatal			the investigation of D. D'Ambly's conduct.	Communication
							Document conveying information to	
							facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding	Deleterate Assessment (Client
1020		2/21/21	Dahh. Ziasi					Privileged - Attorney/Client Communication
1038		3/31/21	Bobby Zisel	+	+		the investigation of D. D'Ambly's conduct. Email chain providing legal advice from in-	Communication
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
1039		2/21/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
1039		3/31/21	iviaya DUI uedux	Jean Neclivatal			Email chain providing legal advice from in-	Communication
							house counsel Mindy Lees* regarding the	Privileged - Attorney/Client
1040		3/31/21	Maya Bordeaux	Jean Nechvatal			investigation of D. D'Ambly's conduct.	Communication
1040		3/31/21	Ividya borueaux	Jean receivatai	1		investigation of D. D Ambiy's conduct.	Communication
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
1041		3/31/21	Maya Bordeaux	Jean Nechvatal			the investigation of D. D'Ambly's conduct.	Communication
10+1		3,31/21					and the stage and the stage at	
							Email chain conveying information to	
							facilitate the rendering of legal advice from	
							in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client
1042		3/31/21	Mindy Lees*	Robert Zisel	Kevin Golen		the investigation of D. D'Ambly's conduct.	Communication
1042		3,31/21		nobert Elser	nerm colem		Document sent for legal review to and	Communication
							prepared in anticipation of litigation at the	
							direction of outside counsel Joseph	
							Mulherin* regarding the D. D'Ambly	
1043		3/21/21	Jean Nechvatal				litigation.	Privileged - Work Product
10-13		3/31/21	pean receivatur	1	1	1	magaaron.	

Log Entry No.	Bates No.	Date	Author/From	То	сс	BCC	Log Description	Privilege Type
1044		3/31/21	Jean Nechvatal				Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly litigation.	Privileged - Work Product
1045			Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client
				edi Welivida			Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	
1046			Jean Nechvatal				litigation. Document sent for legal review to and prepared in anticipation of litigation at the direction of outside counsel Joseph Mulherin* regarding the D. D'Ambly	Privileged - Work Product
1047			Jean Nechvatal Maya Bordeaux	Jean Nechvatal			litigation. Email chain reflecting legal advice from inhouse counsel Mindy Lees* regarding the investigation of D. D'Ambly's conductable of the co	Privileged - Work Product Privileged - Attorney/Client Communication
1049		3/31/21	Martinez, Toni	Jean Nechvatal; Mindy Lees*; Maya Bordeaux			Email conveying information to facilitate the rendering of legal advice from in-house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1050		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1051			Mindy Lees*	Maya Bordeaux			Email chain providing legal advice from in- house counsel regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1052		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1053		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1054		3/31/21	Bobby Zisel				Document conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client Communication
1055		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain providing legal advice from in- house counsel Mindy Lees* regarding the corrective action taken as a result of the D. D'Ambly investigation and the disciplinary policy and procedure.	Privileged - Attorney/Client Communication
1056	NYDN00002088		Maya Bordeaux	Jean Nechvatal			Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding	Privileged - Attorney/Client Communication

Log Entry No.	Bates No.	Date	Author/From	То	сс	всс	Log Description	Privilege Type
1057	NYDN00002089	3/31/21	Mindy Lees*	Robert Zisel	Kevin Golen		Email chain conveying information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client
1058		3/31/21	Maya Bordeaux	Jean Nechvatal			Email chain requesting information to facilitate the rendering of legal advice from in-house counsel Mindy Lees* regarding the investigation of D. D'Ambly's conduct.	Privileged - Attorney/Client
1059		3/31/21		Jean Nechvatal; Mindy Lees*; Maya Bordeaux				Privileged - Attorney/Client Communication
1060		3/31/21	Maya Bordeaux	Jean Nechvatal				Privileged - Attorney/Client Communication

<u>Name</u>	<u>Affiliation</u>
Lynne Allen	Chicago Tribune
Ann Barnes	Tribune Publishing Co.
Maya Bordeaux	Tribune Publishing Co.
Amy Boyles	Tribune Publishing Co.
James Brill	New York Daily News
Ed Bushy	Tribune Publishing Co.
Justin Dearborn	Tribune Publishing Co.
Yasmin Firouzi	Los Angeles Times
Max Fischer*	Sidley Austin LLP
Kevin Golen	Insite Risk Management
Marie Green	New York Daily News
Julie Hart*	Tribune Publishing Co.
Deb Hindin	Chicago Tribune
Eric Hoffman*	Sidley Austin LLP
Terry Jimenez	Tribune Publishing Co.
Lane Kehler	Insite Risk Management
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Matthew Leish	New York Daily News
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Toni Martinez	Tribune Publishing Co.
Joseph Mulherin*	McDermott Will & Emery LLP
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Ginger Otis	New York Daily News
Victoria Rienks	Tribune Publishing Co.
Emily Ruffner	Chicago Tribune
David Smith	Tribune Publishing Co.
Yolanda Stevens	Orlando Sentinel
Michelle Sweeney	New York Daily News
Marci Sweren*	New York Daily News
Sarp Uzkan	Tribune Publishing Co.
Grant Whitmore	Tribune Publishing Co.
Julie Xanders*	Tribune Publishing Co.
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